

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*¹

Debtors.

Chapter 11

Case No. 23-10063 (SHL)

Jointly Administered

**SECOND DECLARATION IN SUPPORT OF THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS' APPLICATION FOR ENTRY OF AN ORDER
AUTHORIZING THE EMPLOYMENT AND RETENTION OF WHITE & CASE LLP
AS COUNSEL EFFECTIVE AS OF FEBRUARY 10, 2023**

I, Philip Abelson, pursuant to 28 U.S.C. § 1746, hereby declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a partner of the firm of White & Case LLP (“**White & Case**”), an international law firm, which maintains offices for the practice of law at, among other locations, New York, New York. Among other admissions, I am a member in good standing of the Bar of the State of New York, and I have been admitted *pro hac vice* in connection with the above-captioned cases. There are no disciplinary proceedings pending against me in any jurisdiction.

2. I submit this declaration (the “**Second Declaration**”) pursuant to sections 328(a) and 1103 of title 11 of the United States Code (the “**Bankruptcy Code**”), Bankruptcy Rules 2014(a) and Rule 2016, and Local Rules 2014-1, 2016-1 and 9013-1 in support of the *Official Committee of Unsecured Creditors' Application for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of February 10, 2023*

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number (or equivalent identifier), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); and Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these chapter 11 cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

(the “**Application**”) [Docket No. 136], filed March 16, 2023.² A first declaration in support of the Application by my partner Gregory G. Pesce was submitted as Exhibit B to the Application (the “**First Declaration**”).

3. On April 13, 2023, the Court entered the *Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of February 10, 2023* [Docket No. 222].

4. To the extent that White & Case determines that any information disclosed herein requires amendment or modification upon White & Case’s completion of further analysis or as additional information becomes available to it, a supplemental declaration will be submitted to the Court reflecting the same. Except as otherwise noted, I have personal knowledge of the matters set forth herein.³

5. As noted in the First Declaration, White & Case has reviewed and will continue to review its files periodically during these chapter 11 cases with respect to known and newly-identified parties in interest. If any new relevant facts or relationship are discovered or arise, White & Case will use reasonable efforts to identify such developments and will promptly file a supplemental declaration.

Supplemental Disclosure Regarding Potential Parties in Interest

6. As stated in the First Declaration, W&C has followed the procedure set forth in the First Declaration to conduct a disclosure review with respect to the Firm’s connections to potential parties in interest. Recently, the Debtors provided White & Case with a list of names of additional Potential Parties in Interest, which are identified on Schedule 1 annexed hereto (the

² Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

³ Certain of the disclosures herein relate to matters within the knowledge of attorneys or employees of White & Case and are based on information provided by them.

“Supplemental Parties in Interest”), and W&C has conducted a disclosure review with respect to such Supplemental Parties in Interest. **Schedule 2** annexed hereto identifies that White & Case currently represents, or has represented within the last two (2) years, certain individuals, entities or their affiliates who are Potential Parties in Interest in matters unrelated to the Debtors, the chapter 11 cases, or such entities’ claims against and interests in the Debtors.⁴

7. Of the entities listed on Schedule 2, none represented more than 1% of White & Case’s revenue for the twelve-month period through September 30, 2023.

Reaffirmation of Statement of Disinterestedness

8. Based on the foregoing, to the best of my knowledge and insofar as I have been able to ascertain, (a) White & Case is a “disinterested person” within the meaning of section 101(14) of the Bankruptcy Code, (b) White & Case holds no interest adverse under section 1103(b) of the Bankruptcy Code, and (c) White & Case has no connection to the Debtors, their creditors, or other parties in interest, except as may be disclosed in the Application, the First Declaration, or this Second Declaration. Accordingly, I respectfully submit that the requirements for White & Case’s retention as attorneys for the Committee have been met and maintained.

⁴ The term “client” means an entity listed as a client or affiliate of a client in an active or closed matter in White & Case’s conflicts search system. To the extent that a Potential Party in Interest falls under more than one category, such Potential Party in Interest may be disclosed below in only one category. Furthermore, the inclusion of a Potential Party in Interest within one or more categories in the Application, this Declaration, or otherwise is for convenience only and is not, and shall not be construed as, an acknowledgement or admission regarding any Potential Party in Interest, including with respect to any claims or relationships that such Potential Party in Interest may have with the Debtors. The disclosures may in Schedule 2 attached hereto may overlap or be redundant with disclosures previously made by White & Case. Additionally, (i) Schedule 2 is over inclusive generally, (ii) whether an actual client relationship exists with the entities listed on Schedule 2 can only be determined by reference to the documents governing White & Case’s representation rather than its potential listing in White & Case’s conflicts database(s), (iii) such analysis has not been undertaken in connection with this connections disclosure, and (iv) where particular name(s) provided by the Debtors are incomplete or ambiguous, White & Case’s search was broad and inclusive and erred on the side of disclosure.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: October 30, 2023

Respectfully submitted,

/s/ Philip Abelson
Philip Abelson
Partner, White & Case LLP

Schedule 1

Parties in Interest List Received from Debtors

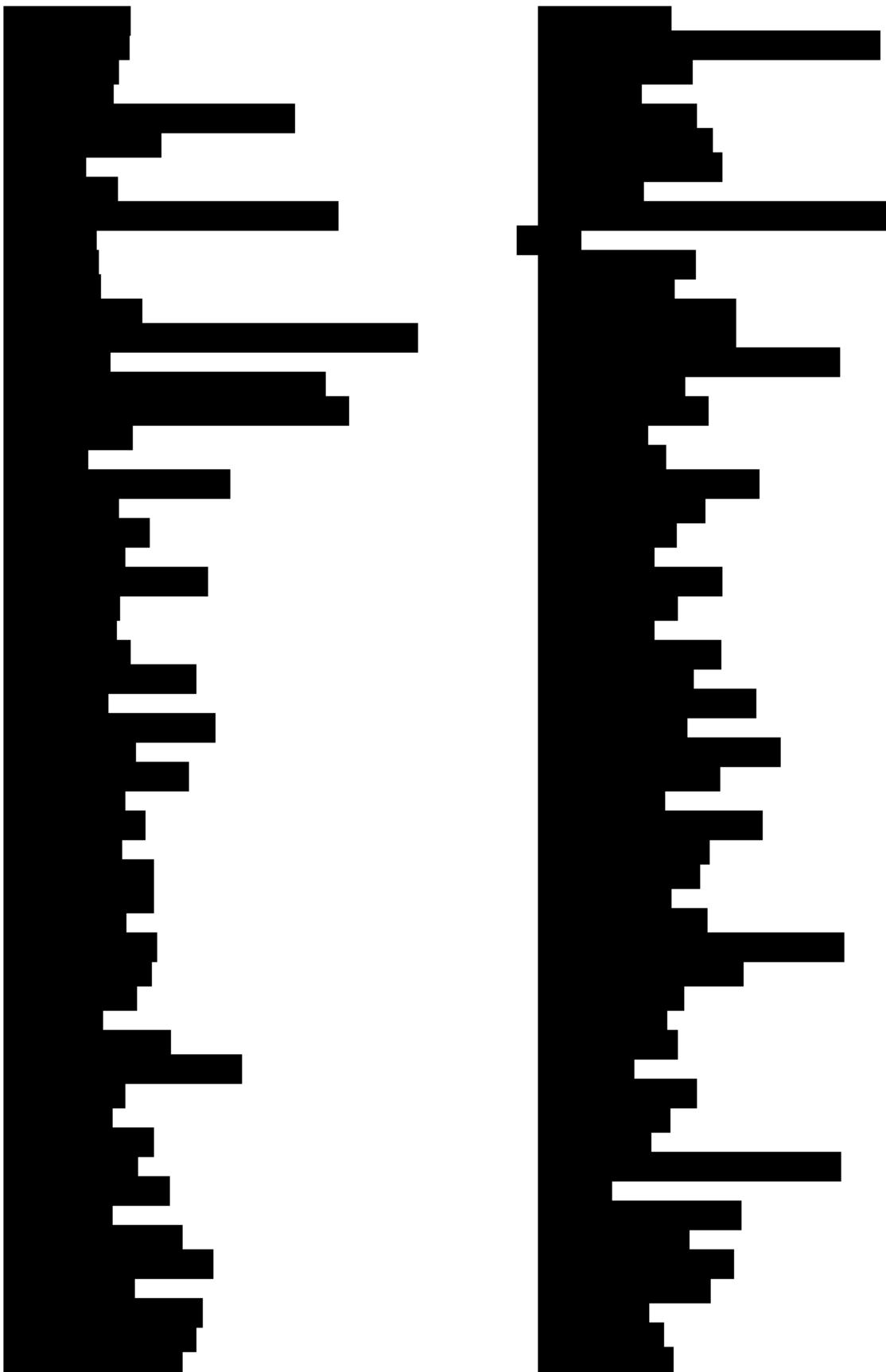
Claimants

the first time in the history of the world, the people of the United States have been called upon to make a choice between a nation that has been the benefactor of the world, and a nation that has been the curse of the world.

A histogram illustrating the frequency distribution of a variable across different value bins. The x-axis represents the value, and the y-axis represents the frequency. The distribution is highly skewed to the right, with the highest frequency at the lowest value.

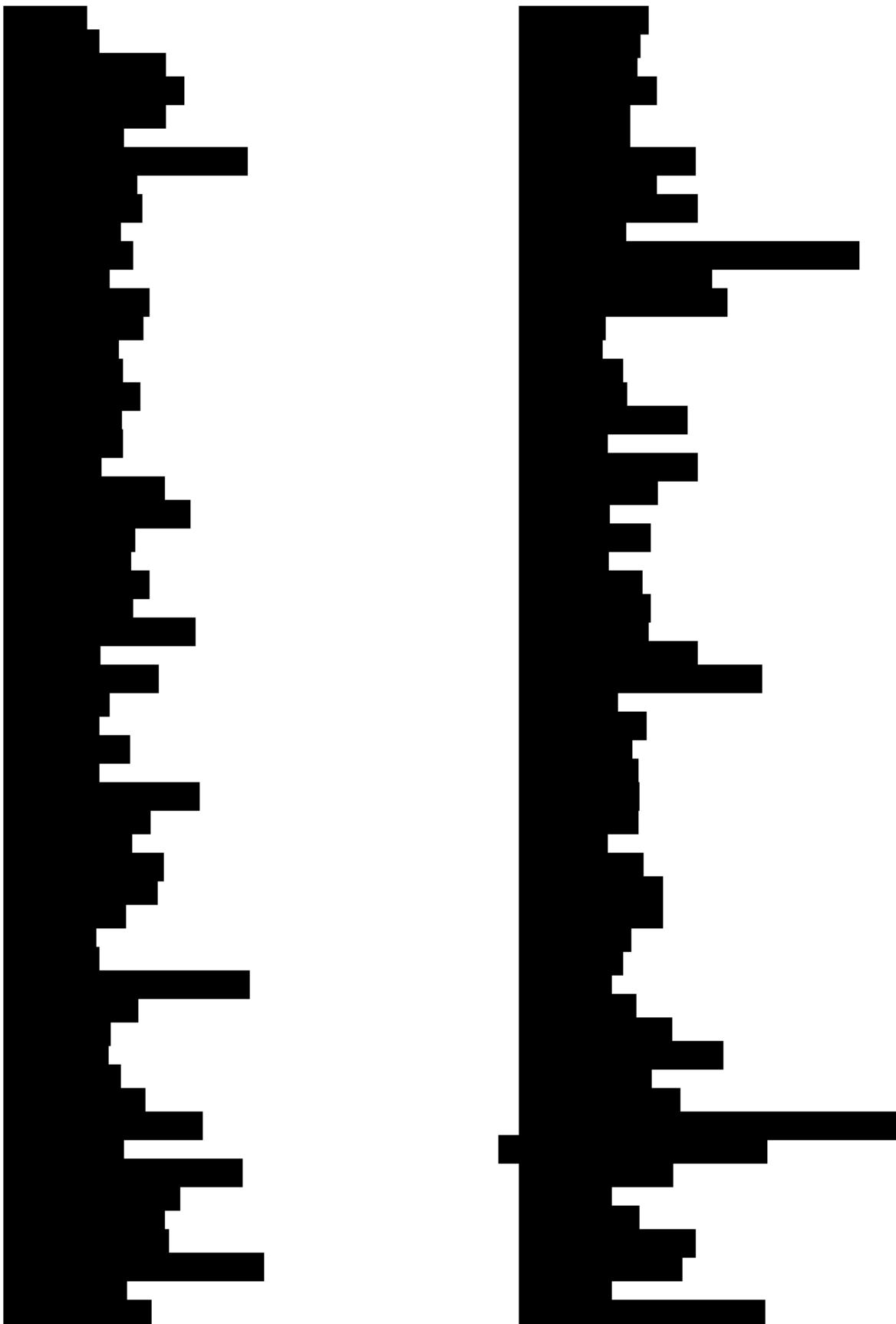
Value Bin	Frequency
0	100
1	80
2	50
3	30
4	20
5	10
6	5
7	3
8	2
9	1
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0



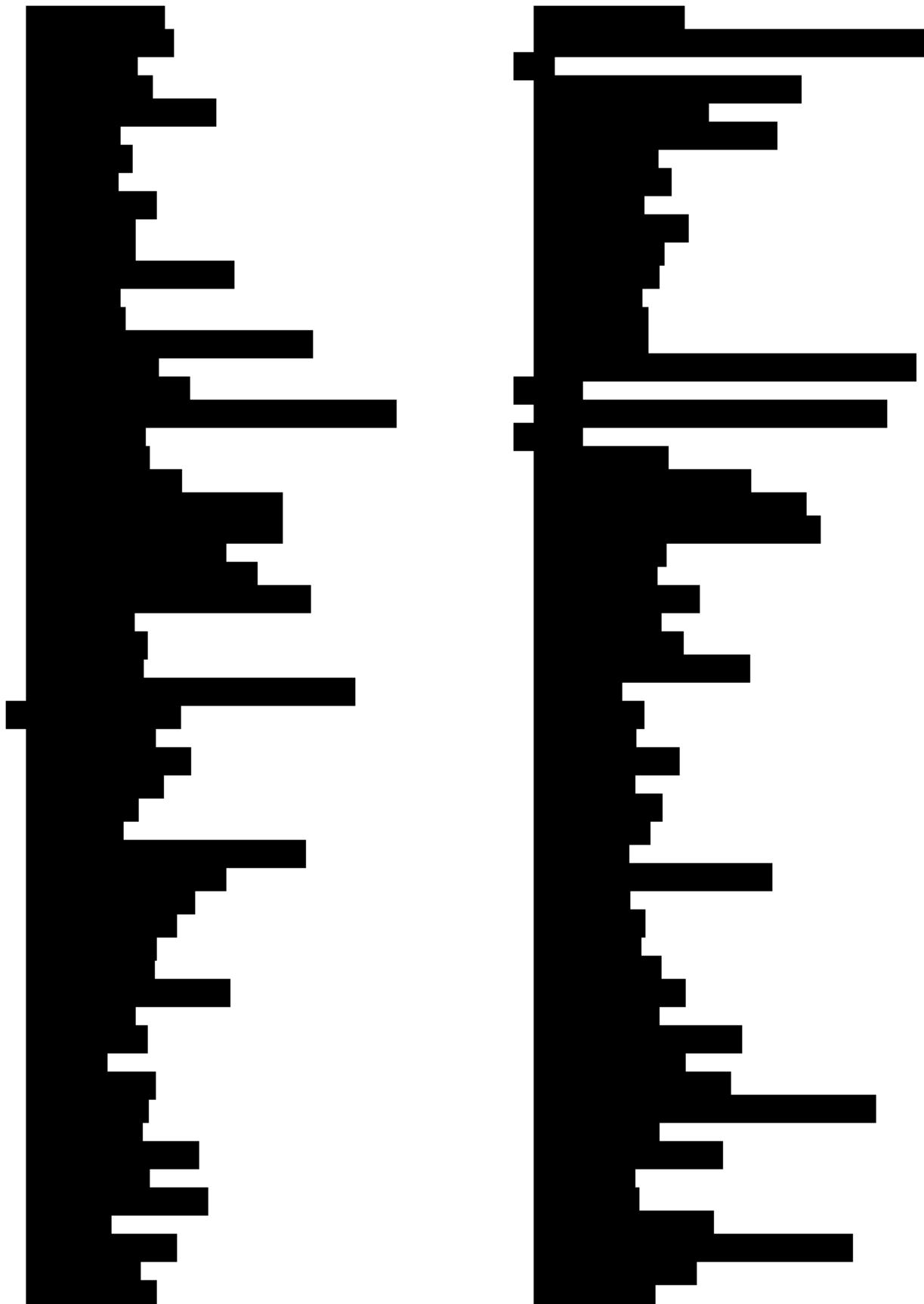




A high-contrast, black and white image showing a vertical column of black pixels on the left and a jagged, stepped pattern of black and white pixels on the right, resembling a digital signal or a stylized waveform.











Taxing Authorities

Central Provident Fund Board

Vendors

Anduril Pte. Ltd.

Certified Kernel Tech LLC

Charles Schwab Co. Inc.

Circle Internet Financial Inc

Complete Discovery Source Inc

EY Corporate Advisors

FGS Global (Us) LLC

Globalization Part

Grabtaxi Pte Ltd

Gunderson Dettmer

Hype Labs Pte. Ltd

M — **L.D.**

Marcum LLP
Mezaik Capital Pte. Ltd

Mozaik Capital National Finance

National Financial Services Pixiu Services

Fixit Services
OCP Capital Pte Ltd

QCI Capital I
Scott Plowman

Scott Howman
Stoneturn Group LLP

1000000000

Schedule 2

White & Case's Relationships with Parties in Interest¹

Category	Name	Open/ Closed
Claimants	[REDACTED]	Closed
Claimants	[REDACTED]	Closed
Claimants	[REDACTED]	Closed
Claimants	[REDACTED]	Open
Claimants	[REDACTED]	Closed
Claimants	[REDACTED]	Open
Claimants	[REDACTED]	Open
Claimants	[REDACTED]	Closed
Claimants	[REDACTED]	Open
Claimants	[REDACTED]	Open
Claimants	[REDACTED]	Closed
Claimants	[REDACTED]	Open
Claimants	[REDACTED]	Closed

¹ White & Case notes that many of the names of the potential parties in interest identified are common names. Accordingly, while White & Case has made these disclosures in an abundance of caution, White & Case expects that the potential parties in interest are likely not clients of the Firm.